

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

GEORGE A. JACKSON, et al., )  
Plaintiffs, )  
v. ) C. A. No. 05-823-\*\*\*  
STANLEY TAYLOR, et al., ) JURY TRIAL REQUESTED  
Defendants. )

**DEFENDANT JOYCE TALLEY'S RESPONSE  
TO PLAINTIFF'S REQUEST FOR ADMISSIONS**

Pursuant to Federal Rule of Civil Procedure 36, Defendant responds to Plaintiff's Request for Admissions as follows:

1. Plaintiff George A. Jackson's July 19, 2005, grievance was filed as an "Emergency Grievance" and received by the SCI Warden's Office on July 20, 2005.

**RESPONSE:** Admitted - based upon copies provided; however, I had no personal knowledge prior to this.

2. Plaintiff George A. Jackson's July 19, 2005, "Emergency Grievance" was not returned to the inmate for processing through the normal Inmate Grievance Procedure (IGP) by the SCI's Warden's Office.

**RESPONSE:** Answering Defendant has no personal knowledge.

3. Plaintiff George A. Jackson's July 19, 2005, "Emergency Grievance" was received by the Chairman on July 21, 2005.

**RESPONSE:** Admitted - based upon copies provided; however, I had no personal knowledge prior to this.

4. Plaintiff George A. Jackson's July 19, 2005, "Emergency Grievance" was not returned to the inmate as unprocessed grievance by the SCI Grievance Chairman.

**RESPONSE:** Answering Defendant has no personal knowledge.

5. During all times relevant to the filing and reviewing of Plaintiff George A. Jackson's "emergency grievance" the Inmate Grievance Chairman was Michael J. Atallian.

**RESPONSE:** Answering Defendant has no personal knowledge.

6. A description of George A. Jackson's "emergency grievance" states, "Inmate workers are constantly experiencing daily symptoms of heat exhaustion (excessive sweating, shortness of breath, etc.,) from the deprivation of an adequate ventilation at the work place."

**RESPONSE:** Admitted - based upon copies provided; however, I had no personal knowledge prior to this.

7. A description of George A. Jackson's "emergency grievance" states, "...and compensate inmate workers for irreparable damages suffered from delay/denial of a safe and healthy work environment."

**RESPONSE:** Admitted – based upon copies provided; however, I had no personal knowledge prior to this.

8. All twenty-five named Plaintiffs was [sic] committed to the custody of the Department of Corrections, and work at the SCI main kitchen between July 2003 thru July 2005 as inmate kitchen workers.

**RESPONSE:** Answering Defendant has no personal knowledge.

9. DOC Food Service Department does not maintain certification records of SCI main kitchen, containing the name of person who performed the inspection of the kitchen.

**RESPONSE:** Answering Defendant has no personal knowledge.

10. Defendants have completed ServSafe training requirements as part of their training as a DOC Food Service Correctional Officer.

**RESPONSE:** Answering Defendant completed the course a number of years ago around 1999. Answering Defendant has no personal knowledge if the other defendants completed the training.

11. DOC Food Service staff has not been trained or educated in the recognition, avoidance and prevention of unsafe conditions at the SCI main kitchen.

**RESPONSE:** Denied. See Response to Request No. 10.

12. George A. Jackson's July 19, 2005, "Emergency Grievance" was granted in favor of the grievant by all three (3) levels of the Inmate Grievance Procedure.

**RESPONSE:** Answering Defendant has no personal knowledge.

13. Since the filing of George A. Jackson's July 19, 2005, "Emergency Grievance" the exhaust ventilation system on the "old side of the SCI main kitchen has not been replaced, maintained and operated as to ensure the required protection by maintaining a volume and velocity of exhaust air sufficient to gather dusts, fumes, vapors or gases from the numerous commercial size convectional, conventional ovens and other commercial equipment.

**RESPONSE:** Answering Defendant does not have sufficient knowledge to admit or deny this statement.

14. The exhaust system shall be in operation continually during all operations which it is designed to served.

**RESPONSE:** Answering Defendant does not have sufficient knowledge to admit or deny this statement.

15. There are seven (7) inmate housing buildings within the SCI prison compound.

**RESPONSE:** Answering Defendant has no personal knowledge.

16. According to the Inmate Grievance DOC Policy 4.4. V procedure:

H. INMATES ARE PROHIBITED FROM SUBMITTED [sic]  
MORE THAN ONE GRIEVANCE ARISING FROM A  
SINGLE INCIDENT.

**RESPONSE:** Admitted.

17. Plaintiff George A. Jackson's July 19, 2005, "emergency grievance" was a job issue.

**RESPONSE:** Answering Defendant does not have sufficient knowledge to admit or deny this statement.

18. All inmate kitchen workers while working in the SCI main kitchen are housed in the same building.

**RESPONSE:** Answering Defendant does not have sufficient knowledge to admit or deny this statement.

19. There were no established and supervised programs for DOC Food Service staff at the SCI main kitchen prior to July 19, 2005, for the education and training of food service staff in the recognition, avoidance and prevention of unsafe conditions at the SCI main kitchen.

**RESPONSE:** Answering Defendant does not have sufficient knowledge to admit or deny this statement.

20. Employers need to periodically evaluate their training programs to see if the necessary skills, knowledge and routines are being properly understood and implemented by their trained employees.

**RESPONSE:** Answering Defendant does not have sufficient knowledge to admit or deny this statement.

**STATE OF DELAWARE  
DEPARTMENT OF JUSTICE**

/s/ Catherine Damavandi  
Catherine Damavandi (ID # 3823)  
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Attorney for State Defendants

Dated: January 2, 2008

***CERTIFICATE OF SERVICE***

I hereby certify that on January 2, 2008, I electronically filed the attached *Defendant Joyce Talley's Response to Plaintiff's Request for Admissions* with the Clerk of Court using CM/ECF. I hereby certify that on January 2, 2008, I have mailed by United States Postal Service, the document to the non-registered parties on the attached list.

STATE OF DELAWARE  
DEPARTMENT OF JUSTICE

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